

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**DECLARATION OF
MIKE HUTCHINSON**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

Defendants.

I, Mike Hutchinson, declare as follows:

1. I am the Chubb Global Markets Systems Director for the European Zone (“EUZ”) and, in this role, I have become familiar with the EZER application that used Blaze Advisor software.
2. EZER was developed by Federal and is a commercial policy administration system that supports Executive Risk products for the EUZ. The EZER application was decommissioned in or around March 2019.
3. Blaze Advisor is a business rules management system (“BRMS”). Federal integrated Blaze Advisor into the EZER application to assist with certain automated decisions related to renewal policy categorization.
4. I understand that the Court ordered Federal to extract the repository files (.xml) and business object model (“BOM”) files (JAR (JAVA Archive) files) for all

internal applications that have used Blaze Advisor software including the EZER application.

5. I have been unable to extract the repository files and BOM files associated with the EZER application. The reasons the repository files and BOM files associated with the EZER application cannot be produced are outlined below.

6. The Blaze Advisor component was turned off on the EZER application in or around March 29, 2019. At this time, the EZER application stopped using the Blaze Advisor component because Federal is decommissioning the EZER application altogether and creating a new long-term archive solution for policy information to service this claims requirement in the future. As part of this decommissioning, the Blaze Advisor component was turned off. It appears that in the process of turning the Blaze Advisor component off the development environment containing the repository files and BOM files ceased to work rendering the rule files inaccessible.

7. Although the EZER application is still active, it does not use the Blaze Advisor component, and is essentially an artifact that can be reviewed, in read-only mode. The EZER application was placed in read-only mode in or around May 8, 2019 and has been in that mode ever since. In read-only mode, no transactions can be made. The application was placed in read-only mode so Federal employees, specifically claims adjusters, could see the original policy details associated with policies previously processed through EZER. It cannot be placed back into a different mode.

8. Based on the above, Federal is unable to access and produce the rule files associated with the EZER application. To my knowledge, the EZER application and its

associated rules were never were involved in decision support regarding claims processing as FICO represents.

9. It is possible to make a production of the EZER application code in its current state in read-only mode. The EZER application is written in the PowerBuilder programming language and the PowerBuilder source code for this application is available. However, the PowerBuilder source code does not contain the business rules that were incorporated into the Blaze Advisor component of EZER.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: *April 1st 2020*

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Mike Hutchinson